

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Maria Mora-Villalpando,

Plaintiff,

v.

U.S. Immigration and Customs Enforcement,  
U.S. Customs and Border Protection, and U.S.  
Citizenship and Immigration Services,

Defendants.

No. C18-655-JLR

Stipulation and ~~Proposed~~ Order for an  
Extension

Note on Motion Calendar:  
February 26, 2019

The parties hereby request an extension of the deadlines for filing responses and replies in support of their motions for summary judgment; the current deadlines are contained in the Court's Stipulation and Order for Deadlines (Dkt. #31). Specifically, the parties request that ICE's March 6, 2019 deadline to file its response to plaintiff's cross-motion for summary judgment be extended to April 5, 2019, and that plaintiff's deadline to file its reply be extended to April 19, 2019.

Good cause is shown for the extension. Defendant ICE has been working diligently to prepare its response to plaintiff's cross-motion for summary judgment, but needs additional time

Stipulation for Extension  
18-655-JLR - 1

UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

1 to draft the response and any supporting documents because of the delays caused by the lengthy  
2 government shutdown. The additional time will ensure that the response is thorough and  
3 comprehensive.

4 Therefore, the parties agree that ICE will file its response to plaintiff's motion for  
5 summary judgment by April 5, 2019, and that plaintiff will file her reply by April 19, 2019.

6 Dated this 26<sup>th</sup> day of February, 2019.

7  
8 /s/ Khaled Alrabe

9 Elizabeth G. Simpson, NC #41596 (admitted *pro*  
10 *hace vice*)

11 Khaled Alrabe, NY Bar Reg. 5542311 (admitted  
12 *pro hac vice*)

13 NATIONAL IMMIGRATION PROJECT  
14 OF THE NATIONAL LAWYERS GUILD

15 89 South St. Suite 603

16 Boston, MA 02111

17 Ph. (617) 412-6794

18 Ph. (703) 587-8563

19 Em. [elizabeth@nipnlg.org](mailto:elizabeth@nipnlg.org)

20 Em. [khaled@nipnlg.org](mailto:khaled@nipnlg.org)

21 /s/ Devin T. Theriot-Orr

22 Devin T. Theriot-Orr, WSBA #33995

23 SUNBIRD LAW, PLLC

1001 4<sup>th</sup> Avenue, Suite 3200

Seattle, WA 98154

Ph. (206) 962-5052

Fax (206) 681-9663

Em. [devin@sunbird.law](mailto:devin@sunbird.law)

BRIAN T. MORAN  
United States Attorney

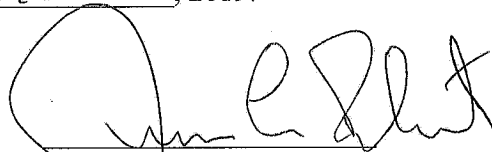
s/ Brian C. Kipnis  
BRIAN C. KIPNIS

s/ Sarah K. Morehead  
SARAH K. MOREHEAD, WSBA #29680  
Assistant United States Attorneys  
Office of the United States Attorney  
Suite 5220, United States Courthouse  
700 Stewart Street  
Seattle, Washington 98101-1271  
Phone: 206-553-7970  
Fax: 206-553-4073  
Email: [brian.kipnis@usdoj.gov](mailto:brian.kipnis@usdoj.gov)  
Email: [sarah.morehead@usdoj.gov](mailto:sarah.morehead@usdoj.gov)

**ORDER**

The parties having so stipulated, IT IS ORDERED that the stipulation is granted. The parties will comply with the deadlines set forth above.

Dated this 26<sup>th</sup> day of Feb., 2019.



James L. Robart  
United States District Judge